

Al Van Huff

From: Al Van Huff <al@vanhuff.com>
Sent: Monday, November 29, 2010 5:01 PM
To: 'Martin Shellist'; 'Lauren Serper'
Subject: RE: McKnight, et al. v. Treasures, et al.; 4:09-CV-03345 - Proposed Notice to Putative Class Members

Marty,

In reviewing the discovery requests and our responses, it appears that the only request that remains outstanding is your request for the names, etc. of the servers and bartenders. We were planning on producing this information in accordance with the judge's order. What other information or documentation are you asking for that we have not already produced?

As for the proposed notice, I have a trial that starts tomorrow morning but will endeavor to review the proposed notice and send you our proposed revisions by the end of the week. Also, I am planning on asking the court for a protective order that limits your communications with the prospective class members to the form of notice that is approved by the court. Are you agreeable to this or do you plan on sending them letters, calling them, or otherwise communicating to them about the case outside of court-approved notice?

Thanks.

Al

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Al Van Huff

From: Martin Shellist <mshellist@eeoc.net>
Sent: Monday, November 29, 2010 5:04 PM
To: Al Van Huff
Cc: Lauren Serper
Subject: Re: McKnight, et al. v. Treasures, et al.; 4:09-CV-03345 - Proposed Notice to Putative Class Members

The few discovery issues that come to mind are the names and contact data for co-workers and other fact witnesses, such as managers and dancers. I'll check on other data we asked for, and I will also need to depose the other Davari brother and the accountant. As for the protective order, these folks are potential witnesses, correct? How can I not be allowed to contact them?

Thanks.

Martin A. Shellist

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From: Al Van Huff <al@vanhuff.com>
Sent: Monday, November 29, 2010 5:29 PM
To: 'Martin Shellist'
Cc: 'Lauren Serper'
Subject: RE: McKnight, et al. v. Treasures, et al.; 4:09-CV-03345 - Proposed Notice to Putative Class Members

Marty,

Isn't the whole idea of having a court-approved notice to limit the information that you are allowed to communicate to the potential class members? I see that we have a difference of opinion on this issue, so I will go ahead and file a motion for a protective order and mark you as opposed unless you indicate that you feel otherwise.

Scheduling the depositions of David Davari and the accountant is not a problem, although I'll need to see about their availability. Are you thinking that you want to do these depositions before the holidays?

Regarding the identities of the dancers and managers, we can discuss this issue on the other side of tomorrow's trial.

Talk to you soon.

Al

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